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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,)
)
Plaintiff,)
v.) Criminal Action No. 08-*45*
)
MATTHEW PALMER,)
)
Defendant.)

INDICTMENT

The Grand Jury for the District of Delaware charges that:

COUNTS ONE TO FIVE

From on or about September 5, 2007, through on or about September 8, 2007, in the District of Delaware, Matthew Palmer, defendant herein, knowingly received and attempted to receive child pornography, that is, computer generated visual depictions in the form of computer files which are of minors engaged in sexually explicit conduct, specifically, actual and simulated sexual intercourse and the lascivious exhibition of the genitals and pubic area, which child pornography had been transported in interstate and foreign commerce by computer, the dates being described more particularly, as follows:

<u>Count</u>	<u>Date Received</u>
1	September 5, 2007
2	September 5, 2007
3	September 5, 2007
4	September 8, 2007
5	September 8, 2007

in violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1).

COUNT SIX

On or about August 2, 2007, in the District of Delaware, Matthew Palmer, defendant herein, knowingly attempted to distribute by computer in interstate and foreign commerce child pornography, that is, visual depictions which are of minors engaged in sexually explicit conduct, specifically, actual and simulated sexual intercourse and the lascivious exhibition of the genitals and pubic area, in violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1).

COUNT SEVEN

On or about October 18, 2007, in the District of Delaware, Matthew Palmer, defendant herein, knowingly possessed a computer hard drive and other digital storage media that contained images of child pornography, that is, visual depictions which are of minors engaged in sexually explicit conduct, specifically, actual and simulated sexual intercourse and the lascivious exhibition of the genitals and pubic area, which child pornography had been transported in interstate and foreign commerce and which had been produced using materials which had been transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

COUNTS EIGHT TO TWELVE

From on or about September 5, 2007, through on or about September 8, 2007, in the District of Delaware, Matthew Palmer, defendant herein, knowingly received and attempted to receive visual depictions, that is, computer files that depict computer images that are or appear to be of a minor

engaging in graphic sexual intercourse, and that lack serious literary, artistic, political, or scientific value, which images had been transported in interstate and foreign commerce by computer, the dates being described more particularly as follows:

<u>Count</u>	<u>Date Received</u>
8	September 5, 2007
9	September 5, 2007
10	September 5, 2007
11	September 8, 2007
12	September 8, 2007

in violation of Title 18, United States Code, Sections 1466A(a)(2)(A) and (B), and 2252A(b)(1).

COUNT THIRTEEN

On or about August 2, 2007, in the District of Delaware, Matthew Palmer, defendant herein, knowingly attempted to distribute by computer in interstate and foreign commerce visual depictions, that is, computer files, that depict computer images that are or appear to be of minors engaging in graphic sexual intercourse, and that lack serious literary, artistic, political, or scientific value, in violation of Title 18, United States Code, Sections 1466A(a)(2)(A) and (B), and 2252A(b)(1).

COUNT FOURTEEN

On or about October 18, 2007, in the District of Delaware, Matthew Palmer, defendant herein, knowingly possessed visual depictions, that is, computer files, that depict computer images that are or

appear to be of minors engaging in graphic sexual intercourse, and that lack serious literary, artistic, political, or scientific value, which images had been transported in interstate and foreign commerce by computer, and which images had been produced using materials that had been shipped and transported in interstate or foreign commerce, in violation of Title 18, United States Code, Sections 1466A(b)(2)(A) and (B), and 2252A(b)(2).

A TRUE BILL:

COLM F. CONNOLLY
United States Attorney

By: Christopher J. Burke
Christopher J. Burke
Assistant United States Attorney

Dated: March 13, 2008